



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 16, 2022

BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Joseph Belmar, 21 Cr. 16 (KMW)*

Dear Judge Wood:

The Government writes, with the consent of defense counsel, to respectfully request an extension of the pretrial deadlines in the above-captioned case. As the Court knows, the defendant in this case previously indicated that he intended to plead guilty, and Your Honor referred the plea hearing to the Magistrate Court. A plea hearing was scheduled to occur today before the Honorable Robert W. Lehrburger, United States Magistrate Judge. At the hearing, however, the defendant decided that he was no longer prepared to plead guilty today.

Under the current pretrial schedule, motions in limine are due today, and other deadlines are quickly approaching. The Government therefore requests that the pretrial deadlines be extended, consistent with the following schedule:

- Motions in limine due: March 23, 2022
- Motion in limine oppositions due: March 30, 2022
- Proposed voir dire due: March 25, 2022
- Proposed jury charge due: March 25, 2022
- Expert notices due: March 25, 2022
- Rule 404(b) notices due: March 25, 2022
- Production of 3500 material: March 28, 2022
- Marked government exhibits due: April 1, 2022
- Final pretrial conference: March 30, 2022, at 11am.

Defense counsel consents to the proposed extensions and the above schedule.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
Jim Ligtenberg
Assistant United States Attorney
(347) 758-0247

cc: Martin Cohen, Esq. (by ECF)